

REMARKS

In an Office Action mailed July 13, 2007, (hereinafter "Office Action"), originally filed Claims 1-49 were rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,857,012 to Sim et al. (hereinafter "Sim."). With this response, Claims 1, 4, 7, 10, 12, 14, 19, 28, 29, 37-43, and 47 are amended. Claims 2 and 11 are canceled, and the remaining claims, Claims 3, 5, 6, 8, 9, 13, 15-18, 20-28, 30-36, and 44-46, 48, and 49 are as previously presented.

Applicants respectfully submit that currently pending Claims 1, 3-10, and 12-49 are allowable over Sim for at least the reasons set forth below. Applicants request reconsideration and allowance of the pending claims.

Rejections Under 35 U.S.C. § 102(e) as Anticipated by Sim et al.

Independent Claims 1 and 10

In the Office Action, it is asserted that Sim anticipates all of the limitations of independent Claims 1 and 10. Applicants respectfully disagree.

Claims 1 and 10, as amended, recite:

1. A computer implemented method of accessing a storage resource for one of a plurality of network-based applications in a multiple server storage system, the method comprising:

obtaining, by a lookup partitioning service server, a resource identifier and a separate application identifier for associating with a storage resource;

determining a looked-up storage server location where said storage resource is located from said lookup partitioning service server based on associating said resource identifier and said application identifier to said looked-up storage server location; and

accessing the storage resource at said looked-up storage server location.

10. A computer readable medium containing computer-executable instructions for performing the method of accessing a storage resource for one of a plurality of network-based applications in a multiple server storage system, the computer-executable instructions comprising instructions for:

obtaining, by a lookup partitioning service server, a resource identifier and a separate application identifier for mapping to a storage resource;

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receiving a looked-up storage partition location where said storage resource is located from said lookup partitioning service server based on associating said resource identifier and said application identifier to said looked-up storage server location; and

accessing the storage resource at said looked-up storage partition location.

(Emphasis added.)

Claims 1 and 10 similarly recite "obtaining, by a lookup partitioning service server, a resource identifier and a separate application identifier" for associating or mapping to a storage resource. Sim, on the other hand, discloses that "[a]n end-user requests a large payload file using a standard interface (such as a web browser) that is running on the end-user's client machine" and "inbound data packets for the service request are forwarded by Load Balancer 1820 to one of the application Servers 1810." See Col. 27, lines 61-67. Sim fails to teach or suggest that a lookup partitioning service server obtains a resource identifier and a separate application identifier for associating or mapping to a storage resource. Accordingly, applicants submit that Claims 1 and 10 are patentable over Sim and respectfully request that Claims 1 and 10 be allowed.

Independent Claims 14, 28, 34, and 47

In the Office Action, it is further asserted that Sim anticipates all of the limitations of Claims 14, 28, 34, and 47. Applicants respectfully disagree.

The Office Action summarily addresses Claims 14, 28, 34, and 47 together with Claims 1 and 10. However, Claims 14, 28, 34, and 47 recite different limitations than those of Claims 1 and 10. In any case, applicants have reviewed the portions of Sim cited by the Examiner in reference to these claims and indeed the entirety of Sim and respectfully submit that Sim does not teach or suggest the recitations of Claims 14, 28, 34, and 47.

Claims 14, 28, 34, and 47 recite:

14. A computer implemented method of managing access to a storage resource for one of a plurality of network-based applications in a multiple server storage system, the method comprising:

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obtaining a resource identifier associated with the storage resource from a front end server;

utilizing said resource identifier to locate, in a lookup store of a lookup partitioning service server, a partition of a storage server where said storage resource is located; and

granting access to the storage resource by providing said location of said partition of said storage server to said front end server.

28. A computer readable medium containing computer-executable instructions for performing the method of managing access to a storage resource for one of a plurality of network-based applications in a multiple server storage system, the computer-executable instructions comprising instructions for:

receiving a resource identifier associated with the storage resource from a front end server;

locating a storage partition where said storage resource is located utilizing said resource identifier in a lookup store of a lookup partitioning service server; and

sending said location of said partition of said storage server to said front end server to grant access to said storage resource.

34. A managed resource computer system for allowing one of a plurality of network-based applications in the managed resource computer system to manage storage resources, the managed resource computer system comprising:

a lookup partitioning services ("LPS") server operative to:

(i) receiving RIDs;

(ii) in response to the receipt of an RID, identifying a storage partition associated with the RID; and

(iii) providing the location of the storage partition associated with the RID to a server so that a client device can access said storage partition.

47. A computer implemented method of managing access to a storage resource in a multiple server storage system, the method comprising:

obtaining a resource identifier to be associated with the storage resource from a front end server;

utilizing said resource identifier to determine in a lookup store of a lookup partitioning service server that no storage resource exists;

calculating a load balancing factor for each storage server of a plurality of storage partitions;

determining, using said load balancing factors, the storage partition in which said new storage resource should be created;

creating a new storage resource in said storage partition;

associating said resource identifier with said storage partition in said resource lookup store; and

granting access to the storage resource by providing said location of said partition of said storage server to said front end server.

Claims 14, 28, 34, and 47 are similarly directed to an environment in which a lookup partitioning service server associates a resource identifier to a storage resource and wherein the *location* of a partition of the storage resource is provided to a server in order to grant access to the storage resource. Claims 14, 28, and 47 further recite that the look-up partitioning server receives the resource identifier from the front end server to which the *location* of the storage server is returned.

On the other hand, Sim discloses a network in which an end-user system issues a request for content and this request is routed to the nearest node at the edge of the network. Each node at the edge of the network is configured to appear as if it has the file stored locally when portions of the file are really stored on other nodes located throughout the network. Transparent to the user, the edge node obtains the content requested by the user for delivery to the end-user system. See Col. 8, line 42 - Col. 10, line 16, and Col. 11, lines 52-67.

Accordingly, Sim does not teach or suggest "obtaining a resource identifier associated with the storage resource from a front end server; . . . and granting access to the storage resource by providing said location of said partition of said storage server to said front end server" as recited in Claim 14; "receiving a resource identifier associated with the storage resource from a front end server; . . . and sending said location of said partition of said storage server to said front end server to grant access to said storage resource" as recited in Claim 28; "providing [by a lookup partitioning server] the location of the storage partition associated with the RID to a server so that a client device can access said storage partition" as recited by Claim 34; and "obtaining a resource identifier to be associated with the storage resource from a front end server; . . . and granting access to the storage resource by providing said location of said partition of said storage server to said front end server" as recited by Claim 47. Applicants respectfully

submit that independent Claims 14, 28, 34, and 47 are thus allowable over Sim and request that the 35 U.S.C. § 102(e) rejections be withdrawn.

Dependent Claims

Claims 3-9, 12, 13, 15-27, 29-33, 35-46, 48 and 49 are dependent on one of Claims 1, 10, 14, 28, 34, and 47 discussed above. By virtue of their dependency on their respective underlying base claim, Claims 3-9, 12, 13, 15-27, 29-33, 35-46, 48 and 49 are allowable for at least the same reasons as their underlying base claim as set forth above, in addition to the other limitations recited therein. Therefore, applicants respectfully submit that all dependent claims are allowable over Sim and request that the 35 U.S.C. § 102(e) rejections be withdrawn.

CONCLUSION

In view of the above, applicants submit that Claims 1, 3-10, and 12-49 are in condition for allowance. Hence reconsideration and passage of the application to issuance is respectfully requested. Should the Examiner have any remaining issues, he is invited to telephone the undersigned, who will endeavor to resolve such issues.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read "Melanie J. Seelig", with a stylized, flowing script.

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